

Attachment A: Annual Air Monitoring Network Plan Checklist

Year: **2012**

Agency: **Great Basin Unified Air Pollution Control District**




40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) include information regarding the following types of monitors: SLAMS monitoring stations including FRM, FEM, and ARM monitors that are part of SLAMS, NCore stations, STN stations, State speciation stations, SPM stations, and/or, in serious, severe and extreme ozone nonattainment areas, PAMS stations, and SPM monitoring stations.

40 CFR 58.10(a)(1) further directs that, “The plan shall include a statement of purposes for each monitor and evidence that siting and operation of each monitor meets the requirements of appendices A, C, D, and E of this part, where applicable.” On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: PAMS, NCore, Speciation (STN/CSN), and NO₂ requirements including near road, area-wide, and RA40.

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

	Meets the requirement and no action requested, unless specified otherwise
	Does not meet requirement action - requested in next year’s plan or outside the ANP process
	Cannot judge the requirement - action requested in next year’s plan or outside the ANP process

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? ¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the req? ⁴	Notes
1.	Submit plan by July 1 st	58.10 (a)(1)	Y	Y	Submitted electronically on 6/29/2012
2.	Statement of purpose for each monitor	58.10 (a)(1)	N	Insufficient info	Information on purpose of each monitoring site was not included in the plan.
3.	30-day public comment / inspection period ⁵	58.10 (a)(1) 58.10 (a)(2)	Y, p.1, Enclosure 3	Y	Public comment from April 20, 2012-May 24, 2012
4.	Modifications to SLAMS network – case when we are not approving actual system modifications (i.e., we will do it outside the ANP process ⁶)	58.10 (a)(2) 58.10(e)	Y, p.14-15	Insufficient info	No new site closures/moves were identified in Section 5, but Table 1 on p.6 shows the PM10 monitor at Flat Rock was shutdown in May 2011. There is insufficient information to determine if the Flat Rock PM10 monitor was appropriately shutdown under the 40 CFR 58.14. A shutdown request was not submitted to EPA, and therefore, the shutdown was not approved by EPA.
5.	Modifications to SLAMS network – case when we are approving actual system modifications per 58.14(c)	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14 (c)		N/A	The plan does not include any new requests for system modification; therefore EPA will not be approving any modifications as part of 2012 plan review process.
6.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		N	Insufficient info	No information or analysis related to previous system modifications was included in the plan. See notes for criteria #4 for more information concerning past system modifications
7.	NCore site operational (by 1/1/2011)	58.10 (a)(3)	Y, p.21	Insufficient info	The 2011 NCore plan was submitted with 2012 ANP, but does not address which parameters are operational or reporting to AQS. Also, no detailed site report was included in App. A for the NCore site.
8.	Pb site for 0.5-1.0 tpy sources operational (by	58.10 (a)(4)	N/A	N/A	No Pb monitoring required by GBUAPCD

¹ Response options: NA (Not Applicable), Yes, No, Incomplete, Incorrect. The responses “Incomplete” and “Incorrect” assume that some information has been provided.

² To the best of our knowledge.

³ Assuming the information is correct

⁴ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge.

⁵ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

⁶ See 58.14(c)

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? ¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the req? ⁴	Notes
	12/27/2011)				
9.	NO2 plan for area-wide and RA40 sites submitted by 7/1/2012	58.10 (a)(5)	N/A	N/A - HQ Approval	
10.	NO2 plan for near-road sites submitted by 7/1/2012	58.10 (a)(5)	N/A	N/A -HQ Approval	No near-road monitoring required by GBAPCD
11.	AQS site identification number for each site	58.10 (b)(1)	Y, p.6, App. A	Y	
12.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Y, p.19, App. A	Y	
13.	Sampling and analysis method(s) for each measured parameter	58.10 (b)(3)	Incomplete, App. A	Insufficient info	Method codes for PM10 @White Mountain (NCORE), Mammoth (Non-FEM TEOM), Lone Pine (Non-FEM TEOM) were not included in the site reports.
14.	Operating schedule for each monitor (see items 44-48)	58.10 (b)(4)	Y, p.10, p.19	Y	
15.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	N/A	N/A	There are no proposed shutdowns/moves in the 2012 plan.
16.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App. D	Y, p.7, App. A	Insufficient info	The Coso Junction PM10 site is characterized as “regional scale” on p.7, but listed as “neighborhood” in the site report. Also, without traffic count and distance to roadway information the appropriate scale cannot be determined
17.	Identification of sites suitable and sites not suitable for comparison to the annual PM2.5 NAAQS as described in Part 58.30	58.10 (b)(7)	Y, App. A	Y	Keeler PM2.5 site report indicates that the data is comparable to the annual standard.
18.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	N/A	N/A	There are currently no MSAs within GBUAPCD’s justification.
19.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	N/A	N/A	No Pb monitoring required by GBUAPCD.
20.	Any source-oriented Pb site for which a waiver has been granted by EPA RA	58.10 (b)(10)	N/A	N/A	No Pb monitoring required by GBUAPCD.

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? ¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the req? ⁴	Notes
21.	Any Pb monitor for which a waiver has been requested or granted by EPA RA for us of Pb-PM10 in lieu of Pb-TSP	58.10 (b)(11)	N/A	N/A	No Pb monitoring required by GBUAPCD.
22.	Document how states and local agencies provide for the review of changes to a PM2.5 monitoring network that impact the location of a violating PM2.5 monitor. ⁷	58.10 (c)	N	Insufficient info	No information was provided.
23.	Precision/Accuracy reports submitted to AQS	58.16(a) App. A 1.3 App. A 5.1.1	N	Insufficient info	No information was provided.
24.	Annual data certification submitted	58.15 App. A 1.3	N	Insufficient info	No information was provided.
25.	Frequency of flow rate verification for manual PM samplers audit	App. A 3.3.2	Y	Y	Monthly
26.	Frequency of flow rate verification for automated PM analyzers audit	App. A 3.2.3	Y	Y	Bi-weekly
27.	Frequency of one-point flow rate verification for Pb samplers audit	App. A 3.3.4.1	N/A	N/A	No Pb monitoring required by GBUAPCD
28.	Frequency of one-point QC check (gaseous)	App. A 3.2.1	N	Insufficient info	No information was provided. One-point QC checks are required for gaseous pollutants at NCORE.
29.	Date of last Annual Performance Evaluation (gaseous)	App. A 3.2.2	N	Insufficient info	No information was provided. Annual PEs are required for gaseous pollutants at NCORE.
30.	Dates of last two semi-annual flow rate audits for PM monitors	App. A 3.2.4 App. A 3.3.3	Incomplete, App. A	Y, Insufficient info	Please include complete information in next years plan.
31.	Dates of last two semi-annual flow rate audits for Pb monitors	App A 3.3.4.1	N/A	N/A	No Pb monitoring required by GBUAPCD
32.	PM2.5 co-location	App. A 3.2.5	Y, p.10	Y	The plan does not discuss this requirement in detail, but there is one PM2.5 site currently operating in the network. Both a primary and a collocated monitor are operated at the PM2.5 site.
33.	Distance between co-located monitors	App. A	Incomplete	Insufficient info	Cannot specifically judge the distance between

⁷ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? ¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the req? ⁴	Notes
		3.2.5.6			collocated instruments @Keeler.
34.	Manual PM10 method co-location met? (note: continuous PM10 does not have this requirement)	App. A 3.3.1	Incomplete	Y	While the collocation requirement for manual PM ₁₀ monitors is currently being met, please include more detailed information concerning the PM ₁₀ collocation requirement and specific information on the operating schedules for manual PM ₁₀ monitors at the Keeler site.
35.	Pb co-location	App. A 3.3.4.3	N/A	N/A	No Pb monitoring required by GBUAPCD
36.	PM10-2.5 co-location (note: only applies to Fresno and Phoenix NCore sites)	App. A 3.3.6	N/A	N/A	No Pb monitoring required by GBUAPCD
37.	Instrument/monitoring method code for each monitor: is it reported properly? Is it reported correctly (i.e., appropriate method code for regulatory monitors)?	App. C 2.4.1.2	Incomplete, App. A	Insufficient info	Site reports Included instrument description and FRM/FEM designation number, which includes method code, but some instruments do not include method code. See notes for criteria #13 for more information.
38.	Start date for each monitor	Required to determine if other req. (e.g., min # and co-lo) are met	Incomplete, p.18	Insufficient info	The full start date for each monitor was not provided.
39.	Instrument monitor type for each monitor	Required to determine if other req. (e.g., min # and co-lo) are met	N	Insufficient info	Specific monitor types are not identified specifically for each site. The only reference to SLAMS monitors is on p.10, which generally states that the 10 sites in the Owens Lake network are designated SLAMS.
40.	Monitoring objective for each instrument	App. D 1.1 58.10 (b)(6)	N	Insufficient info	Basic monitoring objectives (public/timely, NAAQS, or research support) are not included for each site.
41.	Site type for each instrument	App D 1.1.1	Y, p. 7, App. A	Y	Listed as "monitoring objectives". List includes SPM, which is a monitor type, not site type. Mill site report lists "local meteorology" as objective, while p.7 indicates "population oriented".

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? ¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the req? ⁴	Notes
42.	Instrument parameter code for each instrument	Required to determine if other req. (e.g., min # and co-lo) are met	N	Insufficient info	Information was not included for each monitor.
43.	Instrument parameter occurrence code for each instrument	Required to determine if other req. (e.g., min # and co-lo) are met	Incomplete	Insufficient info	The table on p.19 identifies POCs for each site, but information does not assign POC to specific monitor at each of the sites.
44.	Sampling season for ozone (note: date of waiver approval must be included if the sampling season deviates from requirement)	App D, 4.1(i)	N/A	N/A	No SLAMS ozone monitoring
45.	Sampling schedule for PM2.5 - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.12(d) App D 4.7	Y, p.10, p.19	Y	Only one site @Keeler. States that monitor is operating on a 1 in 3 schedule.
46.	Sampling schedule for PM10	58.12(e) App. D 4.6	Incomplete, p.19	Insufficient info	Information included in the plan is unclear. Operating schedules are provided for each site, but specific operating schedules for each specific monitor at a site are not included.
47.	Sampling schedule for Pb	58.12(b) App. D 4.5	N/A	N/A	No Pb monitoring required by GBUAPCD
48.	Sampling schedule for PM10-2.5	58.12(f) App. D 4.8	N/A	N/A	No PM10-2.5 monitoring required by GBUAPCD
49.	Minimum # of monitors for O3[Note: should be supported by MSA ID, MSA population, DV, # monitors, and # required monitors]	App. D 4.1(a) Table D-2	N/A	N/A	No ozone monitoring required in the area
50.	Identification of max. conc. O3 monitor(s)	App. D 4.1 (b)	N/A	N/A	
51.	Minimum monitoring requirements met for SO2	App. D 4.4	N/A	N/A	No SO2 monitoring required in the area
52.	Minimum monitoring requirements met for Pb	App. D 4.5	N/A	N/A	No Pb monitoring required in the area

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? ¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the req? ⁴	Notes
		58.13(a)			
53.	Minimum # of monitors for PM2.5 [Note: should be supported by MSA ID, MSA population, DV, # monitors, and # required monitors]	App. D, 4.7.1(a) Table D-5	Y, p.16	Y	No MSA's in the District's jurisdiction. States that one monitor is required per a "monitoring planning area" requirement in Keeler.
54.	Required PM2.5 sites represent community-wide air quality at neighborhood or urban scale	App. D 4.7.1(b)	Incomplete	Insufficient info	Site types are not assigned on a monitor specific basis. Only provided on site/station basis, though it is important to note that the Keeler site is Population/Neighborhood scale.
55.	For PM2.5, is at least one site in a population-oriented area of expected maximum concentration	App. D 4.7.1(b)(1)	Incomplete	Insufficient info	See comment on #76. The PM _{2.5} monitor @Keeler does not have a specific site type.
56.	If >1 SLAMS PM2.5 required, is there a site in an area of poor air quality	App. D 4.7.1(b)(2)	N/A	N/A	
57.	Minimum monitoring requirements for continuous PM2.5	App. D 4.7.2	Y, p.10, App. A	Y	One cont. PM2.5 monitor @Keeler
58.	Requirements for PM2.5 background and transport sites	App. D 4.7.3	N	Insufficient info	This is a State requirement. The Keeler is not specifically identified as a background/transport site.
59.	Are PM2.5 Chemical Speciation requirements met for official STN sites?	App D 4.7.4	N/A	N/A	
60.	Minimum # of monitors for PM10	App. D 4.6 (a) Table D-4	Y, p. 16	Y	No MSA's in the District's jurisdiction. States that one monitor is required per nonattainment area.
61.	Minimum monitoring requirements met for PM10-2.5 mass	App. D 4.8	N/A	N/A	No PM10-2.5 monitoring required by GBUAPCD
62.	Distance of site from nearest road	App. E 6	Y, App. A	Insufficient info	The appropriate distance cannot be determined due to lack of traffic count information in the plan.
63.	Traffic count of nearest road	App. E	N	Insufficient info	Information was not provided.
64.	Groundcover	App. E 3(a)	Y, App. A	Y	
65.	Probe height	App. E 2	Y, App. A	Y	Apparent type-o on Stanley site report (i.e 19.8 meters above roof, but only 4.4 AGL)
66.	Distance from supporting structure	App. E 2	N	Insufficient info	Information was not provided
67.	Distance from obstructions on roof	App. E 4(b)	Y	Y	
68.	Distance from obstructions not on roof	App. E 4(a)	Y	Y	All identified "obstructions" are not obstructions (i.e. power poles, met towers, antenna, etc.)

	ANP requirement	Citation within 40 CFR 58	Was the info submitted? ¹ If yes, page #s. Flag if incorrect ² ?	Does the information provided ³ meet the req? ⁴	Notes
69.	Distance from trees	App. E 5	Y	Y	
70.	Distance to furnace or incinerator flue	App. E 3(b)	Y	Y	
71.	Unrestricted airflow	App. E 4(a) App. E 4(b)	Y	Y	
72.	Probe material (if applicable)	App. E 9	N	Insufficient info	Information was not provided.
73.	Residence time (if applicable)	App. E 9	N	Insufficient info	Information was not provided.
74.	Not required as part of plan but good to check				
75.	For SPMs listed as non-regulatory, note the start Date of FRM/FEM/ARM at SPM. If > 24 months, agency must supply information that App A, C or E requirements were not met.	58.20(c) – (e)	Incomplete	Insufficient info	Cannot determine.

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period? **Yes, comments were submitted by the Los Angeles**

Department of Water and Power (LADWP)

If no, skip the remaining questions.

If yes:

- Were any of the comments substantive? **Yes**
 - If yes, which ones? **The comments were primarily concerned with monitoring pollution near the Owens Lake. The substantive comments related to the ambient air monitoring network are those regarding PM₁₀ monitoring requirements in 40 CFR 58. See Attachment D for EPA responses to substantive comments.**
 - Explain basis for determination if any comments were considered not substantive: **Comments that were not related to PM₁₀ monitoring requirements (e.g., planning issues such as the 2008 Owens Valleys SIP emissions inventory development, source identification, or the use of non-FRM/FEM monitoring equipment used in the Dust ID program) were not considered substantive for the annual monitoring network plan.**
- Did the agency respond to the substantive comments?
 - If yes, was the response adequate? **Yes**
- Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)? **No**
- Are the sections of the annual network plan that received substantive comments approvable after consideration of comments?
 - If yes, provide rationale: **Yes. The comments did not provide compelling information to disapprove the ANP.**